



Miedel & Mysliwiec LLP

April 5, 2021

**VIA ECF**

Hon. John G. Koeltl  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED

*John G. Koeltl*  
4/5/21  
John G. Koeltl, U.S.D.J.

**Re:** *United States v. Michelle Landoy, 17 Cr. 137 (JGK)*

Dear Judge Koeltl:

Ms. Landoy is scheduled to be sentenced on June 15, 2021. As the Court is aware, Ms. Landoy is currently released on bond pending sentencing, with conditions limiting her travel to the Southern and Eastern Districts of New York and the District of New Jersey. Ms. Landoy has been fully compliant with her conditions of release and has been granted a number of requests for permission to travel. See ECF Nos. 247, 263, 307, 331, 359, 368, and 405.

I write to respectfully request that the Court modify Ms. Landoy's conditions of release so that she may travel anywhere within the United States, provided she inform her Pretrial Services Officer of her complete itinerary 3-5 days in advance. Ms. Landoy would like to travel regularly in the spring and summer while she awaits sentencing, and such a modification would prevent repeated travel requests in the coming months.

The Government, through AUSA David Abramowicz, and Pretrial Services, through Officer Madalyn Toledo, informed me that they do not object to this request.

Thank you for the Court's consideration of this letter motion.

Very truly yours,

/s/

Aaron Mysliwiec  
*Attorney for Michelle Landoy*

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: <u>4-5-2021</u>

cc: All counsel of record (via ECF)